

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

CYNTHIA ANNE DIVEGLIA,	:	
Plaintiff	:	Civil Action No. 1 CV-00-1342
	:	
v.	:	
	:	
NORTHWESTERN MUTUAL LIFE	:	
INSURANCE COMPANY,	:	(Judge James McClure)
Defendant	:	

**MOTION TO ENLARGE TIME IN WHICH TO
RESPOND TO MOTIONS IN LIMINE**

AND NOW, this 27th day of May, 2004, the Defendant, by and through its counsel, files the following Motion and in support thereof avers as follows:

1. The above action is an action for disability benefits.
2. By Court Order dated March 23, 2004, this Honorable Court set May 17, 2004 as the deadline for filing Motions in Limine.
3. Both parties timely filed Motions in Limine.
4. The date for filing a Responsive Brief to Plaintiff's First Motion in Limine is June 1, 2004. The date for filing a Responsive Brief to Plaintiff's Second Motion in Limine is June 8, 2004.
5. Defendant would like to file a Brief in Opposition to both motions on June 8, 2004.

6. The Defendant seeks an enlargement of time from June 1, 2004 to June 8, 2004 to file responsive briefs to both Motions in Limine.

7. The Plaintiff concurs with Defendant's Motion as is indicated on the Certificate of Concurrence, attached hereto.

WHEREFORE, the Defendant requests this Honorable Court to enlarge the time for filing responsive briefs to Plaintiff's Motions in Limine, from June 1, to June 8, 2004.

STEVENS & LEE

By 

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Attorneys for Defendant

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:
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NORTHWESTERN MUTUAL LIFE :
INSURANCE COMPANY, : (Judge James McClure)
Defendant :
:

CERTIFICATE OF CONCURRENCE

I, Kirk L. Wolgemuth, hereby certify that I have spoken to Archie Diveglia on May 27, 2004, in regard to this motion and he concurs with the filing of the motion.

STEVENS & LEE

By 
E. Thomas Henefer
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P.O. Box 679
Reading, Pennsylvania 19603
(610) 478-2000

Attorneys for Defendant

CERTIFICATE OF SERVICE

I, KIRK L. WOLGEMUTH, do hereby state that I have served a copy
of **MOTION TO ENLARGE TIME IN WHICH TO RESPOND TO**
MOTIONS IN LIMINE upon counsel for Plaintiff by first class mail as follows:

Archie V. Diveglia, Esquire
2 Lincolnway West
New Oxford, PA 17350



Kirk L. Wolgemuth